

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Benito Rojas,	:	Bankruptcy No. 24-22690-JAD
	:	
Debtor.	:	Chapter 13
	:	
<hr/> Benito Rojas,	:	
	:	Document No. 39
Movant,	:	
	:	Related to Document No. 37
v.	:	
	:	
No Respondents,	:	
	:	
Respondent.	:	

**AMENDED CONSENT ORDER OF COURT AUTHORIZING DEBTOR'S
PARTICIPATION IN PENNSYLVANIA HOMEOWNER ASSISTANCE PROGRAM**

Whereas Benito Rojas ("Debtor") wish to apply for assistance under the Pennsylvania Homeowner Assistance Program with respect to the Property at 8960 Knoll Street, Allison Park, PA 15101.

Whereas, the program requires the approval of the Trustee or Bankruptcy Court;

Whereas the Trustee consents to the Debtor's participation but believes it in the best interest of all parties to formalize the consent by Order of Court;

AND NOW therefore upon the consent of the Debtor and Trustee it is hereby ORDERED:

(1) The Debtor are expressly authorized to participate in the PAHAF program. Trustee acknowledges that to the extent relief is granted funds will be distributed directly to the mortgage lender/servicer, contract for deed holder, county treasurer, local taxing authority, hazard insurance company, homeowners' / condominium association, or other payee by the PAHAF and/or its authorized agents on behalf of the applicant.

(2) In the event there are any funds distributed as result of the Debtor's participation, Debtor shall file a report with the Court that expressly lists the amounts distributed and to whom and shall, to the extent the distributions affect claims to have been paid under the Plan file an amended plan or a stipulated order modifying the plan to account for the distributions.

(3) The Trustee or an attorney for the Trustee on her behalf is authorized to sign the PAHAF application form to the extent that an actual signature is required in addition to this Order.

So ORDERED, this 16th day of January, 2025 :


U.S. Bankruptcy Judge **sjk**

Jeffery A. Deller

Consented to:

/s/Brian C. Thompson
Brian C. Thompson, Esquire
PA I.D. No. 91197
THOMPSON LAW GROUP, P.C.
301 Smith Drive, Suite 6
Cranberry Township, PA 16066
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com
Attorney for Debtor

FILED
1/16/25 3:03 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA

/s/ Kate DeSimone
Kate DeSimone, Esq.
PA I.D. No. 42575
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
inquiries@chapter13trusteewdpa.com
Attorney for Chapter 13 Trustee



PAHAF.org

(888) 987-2423

PAHAF ID

Date

Applicant Name Benito Rojas

Address 8960 Knoll Street, Allison Park, PA 15101

Pennsylvania Homeowner Assistance Program Background

Section 3206 of the American Rescue Plan Act of 2021 authorized the Homeowner Assistance Fund (HAF). The Homeowner Assistance Fund provides \$9.9 billion to states to assist homeowners that have experienced the greatest hardships as a result of the COVID-19 pandemic. Applicable funding uses include delinquent mortgage payments to minimize foreclosures and reduce housing instability resulting from financial hardship induced by the COVID-19 pandemic. Pursuant to these guidelines, the HAF allocation for Pennsylvania is \$350,361,655.00.

On April 14, 2021, Treasury released "Homeowner Assistance Fund Guidance" (HAF Guidance) which outlined policy guidelines for states' HAF programs. This included a description of qualified expenses, eligibility criteria, and protocols for HAF Plan submission to the Treasury for approval. As discussed below, this HAF Guidance was updated on August 8, 2022.

Pennsylvania Housing Finance Agency (PHFA) will manage Pennsylvania's HAF program which will be known as the Pennsylvania Homeowner Assistance Program (PAHAF). The goal of the PAHAF is to deliver Homeowner Assistance Fund opportunities to eligible homeowners across Pennsylvania to stem housing instability and mortgage/loan delinquency.

Assistance Provided under PAHAF

Pennsylvania Housing Assistance Fund provides homeowner assistance through a:

- Mortgage Reinstatement Program
- Mortgage Reinstatement with Forward Mortgage Payment Assistance Program
- Forward Mortgage Payment Assistance Program
- Payment of Eligible Delinquent Real Estate Taxes, Insurance, and Fees such as reasonable legal fees incurred by servicers, homeowner association dues, condominium association fees, liens of extinguishment, or special assessments, and personal property taxes for unattached mobile homes
- Payment for Delinquent Utility Bills

The maximum per eligible homeowner household assistance for the PAHAF, including the PAHAF Pilot, will be capped at \$50,000 per household.

PAHAF assistance is structured as a non-recourse grant, recoverable in the event of fraud or overpayment. Pennsylvania Housing Finance Agency or its agent will disburse PAHAF Assistance directly to the mortgage lender/servicer, contract for deed holder, county treasurer or local taxing authority, hazard insurance company, homeowners/condominium association, and/or other payee as applicable.



This project is being supported, in whole or in part, by federal award number HAF-0131 awarded to the Pennsylvania Housing Finance Agency by the U.S. Department of the Treasury.





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Funding will not be provided directly to the applicant, except in rare circumstances where a dual-party check issued in the applicant and payee's names and requiring applicant countersignature for deposit on debt account may be issued. Pennsylvania Housing Finance Agency or its agent will disburse the amount quoted by the entity. Any discrepancies must be resolved by the homeowner and lender/servicer or other payee.

Additional Information

You may obtain additional information about the program by visiting the Pennsylvania Homeowner Assistance Fund (PAHAF) website at <https://pahaf.org/> or by calling (888) 987-2423.

Request for Written Approval of Court or Trustee

To participate in the PAHAF, applicants who are currently in bankruptcy proceedings must obtain approval from the Bankruptcy Court or appointed Bankruptcy Trustee to participate in the program. While PAHAF understands that this is not typically a condition of bankruptcy proceedings, the PAHAF has been informed by mortgage loan servicers and other eligible payees of the program that such approval must accompany the program's payment on the applicant's behalf in order for the payee to accept and apply payment to the applicant's account(s). Please be aware that failure to return the required authorization from the Court or the Trustee will prohibit the debtor from receiving funds from the PAHAF program, if eligible.

Authorization to Participate

Court Name: United States Bankruptcy Court for the Western District of Pennsylvania

Docket/Case Number: 24-22690-JAD

Proceeding Title: Benito Rojas

☐

I am the Judge assigned to this matter.

☒

staff attorney to the
I am the Bankruptcy Trustee assigned to this matter.

The bankruptcy case involving Benito Rojas is a pending matter before the court. The Court has no objection to the aforementioned individual participating in the PAHAF where such funds will be distributed directly to the mortgage lender/servicer, contract for deed holder, county treasurer, local taxing authority, hazard insurance company, homeowners/condominium association, or other payee by the PAHAF and/or its authorized agents on behalf of the applicant. Such grant benefits are expressly for the purpose of paying delinquent amounts owed related to the property located at

8960 Knoll St., Allison Park PA 15101



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Ronda J. Wimmer

Judge or Trustee Printed Name

1-16-25

Date

Kate DeSimone, staff attorney

Signature

412-471-5566

Phone Number

600 Grant St Ste 3250 Rm PA 15219

Address

Fax Number

inquiries@chapter13trusteeofpa.com

Email Address



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In re:
Benito Rojas
Debtor

Case No. 24-22690-JAD
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Jan 16, 2025

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 18, 2025:

Recip ID	Recipient Name and Address
db	+ Benito Rojas, 5900 Babcock Blvd #41, Pittsburgh, PA 15237-2555

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 18, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 16, 2025 at the address(es) listed below:

Name	Email Address
Brian C. Thompson	on behalf of Debtor Benito Rojas bthompson@ThompsonAttorney.com blemon@thompsonattorney.com;bthompson@ecf.courtdrive.com;mgillespie@thompsonattorney.com;kfinke@thompsonattorney.com;mrowe@thompsonattorney.com;thompson.brianr111424@notify.bestcase.com
Denise Carlon	on behalf of Creditor M&T BANK dcarlon@kmlawgroup.com
Jeffrey Hunt	on behalf of Creditor Peoples Natural Gas Company LLC ecfpeoples@grblaw.com PNGbankruptcy@peoples-gas.com
Keri P. Ebeck	on behalf of Creditor Duquesne Light Company kebeck@bernsteinlaw.com btemple@bernsteinlaw.com;aepiscopo@bernsteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bernsteinlaw.com
Lisa M. Burkhart	on behalf of Creditor Highlands at Chapel Hill Condominium Association attylisaburkhart@gmail.com fjug@bmr-law.com

District/off: 0315-2

User: auto

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Date Rcvd: Jan 16, 2025

Form ID: pdf900

Total Noticed: 1

Mario J. Hanyon

on behalf of Creditor KeyBank N.A. wbecf@brockandscott.com, mario.hanyon@brockandscott.com

Mary F. Kennedy

on behalf of Creditor Citizens Bank N.A. s/b/m to Citizens Bank of Pennsylvania mary@javidianlaw.com,
tami@javidianlaw.com;angie.harrigan@javidianlaw.com

Office of the United States Trustee

ustpre03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

Stephen Russell Franks

on behalf of Creditor The Huntington National Bank amps@manleydeas.com

TOTAL: 10